

**UNITED STATES FEDERAL DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

American Civil Liberties Union)
 Center for Constitutional Rights)
 Physicians for Human Rights)
 Veterans for Common Sense)
 Veterans for Peace,

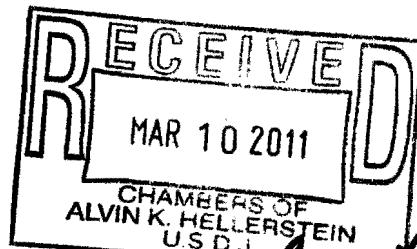
Plaintiffs,

v.

Department of Defense, and its
 Components Department of Army, Dept
 of Navy, Dept. of Air Force, Defense
 Intelligence Agency, Department of
 Homeland Security; Department of
 Justice; and its Components Civil Rights
 Division, Criminal Division, Office of
 Intelligence and Privacy, Office of Intelligence
 Policy and Review, Federal Bureau of
 Investigation; Department of State; and
 Central Intelligence Agency,

Defendants.

USDC SDNY
DOCUMENT FOR THE
ELECTRONIC FILING FILED
DOC #:
DATE FILED: 3/11/11



Motion denied. No one looks
 at experience of petitioner, a
 professional engineer employed
 by the Dep't of Energy, does
 not suggest the likelihood of
 useful assistance with
 regard to the pending
 motions.

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of

Law In Support of Motion for Leave to File Brief, *Amicus Curiae*, together with
 declaration of Joseph Carson and proposed brief of amicus curiae annexed thereto,

amicus curiae Joseph Carson moves this Court before the Honorable Alvin K.

Hellerstein, United States District Judge, for leave to file the proposed brief

amicus curiae, which is focused only the motion for sanctions, docket no. 254,

3/11/11
 Alvin K.
 Hellerstein

which is now being briefed to the Court.

Respectfully Submitted,

Joseph P. Carson, P.E., Pro Se
10953 Twin Harbor Dr
Knoxville, TN 37934 865-300-5831

TABLE OF CONTENTS FOR MOTION

(Pursuant to Rule 2(B.) of the Individual Rules of the Honorable Alvin K. Hellerstein, Southern District of New York)

Memorandum of Law in Support of Motion for Leave to File Brief *Amicus Curiae*

Exhibit 1: CIA FOIA response of March 12, 2010

Exhibit 2: Mr. Carson's FOIA appeal of March 19, 2010

Exhibit 3: CIA acknowledgment of FOIA appeal, April 5, 2010

Exhibit 4: CIA FOIA appeal response of July 19, 2010

Declaration of Joseph P. Carson

Exhibit 1: Proposed Brief of *Amicus Curiae*

CERTIFICATE OF SERVICE

I certify that the following documents for this case,

1. Notice of Motion
 2. Memorandum of Law
 3. Declaration of Joseph Carson
 4. Brief Amicus Curiae

were served by commercial delivery and email on:

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March 10, 2011